## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA No. 3:10-00018 v. **JUDGE HAYNES** 

DANIEL QUAIL

MOTION TO ALLOW LATE FILING

The reder to be filed Defendant moves the court to allow his sentencing memorandum to be filed today, two days late. The memorandum was due on November 28, 2011. Undersigned 12counsel found that it took longer than he expected to synthesize two years of work and edit the product into something of reasonable length and comprehensibility.

Respectfully submitted,

s/ Henry A. Martin HENRY A. MARTIN (BPR #002830) Federal Public Defender SUMTER L. CAMP Assistant Federal Public Defender 810 Broadway, Suite 200 Nashville, TN 37203 615-736-5047

Attorneys for Daniel Quail

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 30, 2011, I electronically filed the foregoing Motion to Allow Late Filing with the clerk of the court by using the CM/ECF system, which will send a Notice of Electronic Filing to the following: S. Carran Daughtrey, Lynne T. Ingram, and Byron M. Jones, Assistant United States Attorneys, 110 Ninth Avenue South, Suite A961, Nashville, TN 37203.

> s/ Henry A. Martin HENRY A. MARTIN